

EXHIBIT I
(Affidavit of Charles F. Reid)

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF SOUTH CAROLINA
COLUMBIA DIVISION**

THE SOUTH CAROLINA STATE
CONFERENCE OF THE NAACP,

and

TAIWAN SCOTT, on behalf of himself and all
other similarly situated persons,

Plaintiffs,

v.

HENRY D. MCMASTER, in his official
capacity as Governor of South Carolina;
THOMAS C. ALEXANDER, in his official
capacity as President of the Senate; LUKE A.
RANKIN, in his official capacity as Chairman
of the Senate Judiciary Committee; JAMES H.
LUCAS, in his official capacity as Speaker of
the House of Representatives; CHRIS
MURPHY, in his official capacity as Chairman
of the House of Representatives Judiciary
Committee; WALLACE H. JORDAN, in his
official capacity as Chairman of the House of
Representatives Elections Law Subcommittee;
HOWARD KNAPP, in his official capacity as
interim Executive Director of the South
Carolina State Election Commission; JOHN
WELLS, Chair, JOANNE DAY, CLIFFORD
J. EDLER, LINDA MCCALL, and SCOTT
MOSELEY, in their official capacities as
members of the South Carolina Election
Commission,

Defendants.

Civil Action No. 3:21-cv-03302-JMC-TJH-
RMG

AFFIDAVIT OF CHARLES F. REID

PERSONALLY APPEARED BEFORE ME, Charles F. Reid, who after first being duly
sworn, deposes and states as follows:

CR
1/18/2022

1. I am above the age of eighteen (18) and I submit this affidavit based upon my personal knowledge and recollection.

2. I currently serve as the Clerk of the South Carolina House of Representatives, a named defendant in this case. I was most recently elected Clerk of the House on January 14, 2020, after returning to the House from a stint in the private sector. Prior to that time, I also served as Clerk of the House from November 30, 2004, to March 31, 2019. I was Counsel to the Speaker of the House from 1995 until 2001 and returned to that role in 2004. From 2001 until 2004, I was engaged in the private practice of law with the former McNair Law Firm, which is now known as Burr & Forman, LLP.

3. As the current Clerk of the House, I am familiar with this litigation and am aware that the current Speaker of the House, James H. Lucas, is a defendant in this litigation and will be key witness as well.

4. I was involved as outside counsel to the House during the litigation of *Colleton Cty. Council v. McConnell*, 201 F. Supp. 2d 618 (D.S.C. 2002) and was also involved tangentially as Clerk during the litigation of *Backus v. South Carolina*, 857 F. Supp. 2d 553 (D.S.C.), *aff'd*, 568 U.S. 801 (2012).

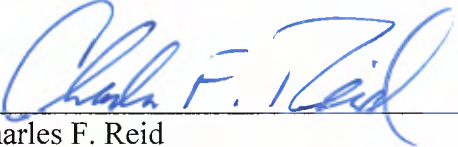
5. I recall that the the Honorable Richard M. Gergel ("Judge Gergel"), one of the three judges currently assigned to the Three-Judge Panel to preside over this case, was lead counsel for then-Governor James H. Hodges in the *Colleton County* litigation.

6. I recall Judge Gergel as lead counsel taking every deposition on behalf of Governor Hodges. My recollection of Judge Gergel's examinations of deponents is that they were all vigorous and, in some instances, zealous to the point of aggressive.

CB
1/18/2022


7. I recall that Judge Gergel personally deposed Speaker Lucas (who was then a sitting member of the House) in the *Colleton County* litigation. Based upon my opinion and recollection, Judge Gergel's examination of Speaker Lucas can be characterized as aggressive. His vigorous examination was not shocking at the time given the fact that his and Governor Hodges' interests were strongly in opposition to the interests of the House of Representatives in that action.

FURTHER AFFIANT SAYETH NAUGHT.



Charles F. Reid

SWORN AND SUBSCRIBED TO BEFORE
ME THIS 18th day of January, 2022.



Notary Public, State of South Carolina
My Commission Expires: 12/7/2027